

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM (formerly known as
ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEFENDANT'S ASSENTED-TO MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFFS' MOTION TO COMPEL**

Pursuant to Local Rule 7.1(b)(2), Dexia Bank Belgium ("Dexia") respectfully moves this Court to grant an extension of time to respond to Plaintiffs' Motion to Compel documents withheld or redacted as privileged and memorandum of law submitted in support thereof. In support of this Motion, Dexia states as follows:

1. On June 16, 2006, plaintiffs in the above captioned cases ("Plaintiffs") filed a Motion to Compel production of certain documents withheld or redacted as privileged by Dexia. The deadline to file papers in opposition to Plaintiffs' motion is June 30, 2006.

2. On June 27 and 28, 2006 (respectively), Dexia produced revised privilege and redacted logs addressing some of the concerns raised by plaintiffs. Given this development, the parties need additional time to attempt to resolve or narrow these issues.

3. By letter, dated June 29, 2006, Plaintiffs have assented to a two-week extension for Dexia to respond to their motion. Dexia therefore requests that this Court grant its assented-to motion for a two-week extension to respond to Plaintiffs' motion, which means that the new deadline to respond would be on July 14, 2006.

Wherefore, Dexia respectfully requests that this Court enter an order in each of the above-captioned actions granting Dexia an extension of time to respond to Plaintiffs' Motion to Compel documents withheld or redacted as privileged to July 14, 2006.

Dated: June 30, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

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Counsel for Dexia Bank Belgium

Certification

The above-signed counsel hereby certifies that, pursuant to Federal Rule of Civil Procedure 37(a) and Local Rules 7.1(A)(2) and 37.1, counsel for the parties have conferred and in good faith negotiated the issues within this motion. Counsel for Plaintiffs has assented to the granting of this motion.

CERTIFICATE OF SERVICE

I hereby certify that this document will be filed through the ECF system, which filing will constitute service of the document upon all registered ECF users as identified on the Notice of Electronic Filing (NEF). A paper copy of this document has been mailed in accordance with Fed. R. Civ. P. 5(b) to all those case participants not identified on the NEF as electronic recipients.

/S/ Breton Leone-Quick

Dated: June 30, 2006